1. GENERAL INFORMATION

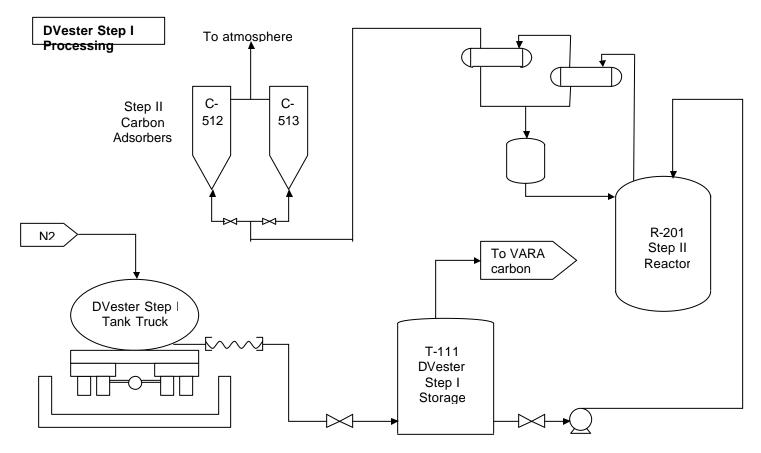
1.1. CAS NUMBER 63721-05-1

1.2. CHEMICAL NAME Methyl 3,3-dimethyl-4, pentenoate

1.3. EXPOSURE (CLOSED SYSTEM)

1.3.1. PROCESS DESCRIPTION:

DVester Step I (methyl dimethyl pentenoate) is unloaded from tank trucks to T-111 using low pressure nitrogen. T-111 vents to the water scrubbers and then to the VARA carbon adsorption system. The Step I is charged to the R-201 reactor, where it reacts with carbon tetrachloride to form DVester Step II. The step II reaction system vents to C-512 and C-513, the step II carbon adsorbers. The step II product is then transferred to one of two storage tanks. The entire system is closed.



1.3.2. MONITORING DATA:

Wastewater monitoring - Wastewater samples are taken before every pump down to the south plant carbon beds. The limit for Step I in the water is 450 ppm maximum. In 2002, our average concentration of Step I in this wastewater stream was 1.55 ppm.

IH Data – IH monitoring was conducted in 1987. Of twenty sample locations measured, only two locations detected the presence of Step I in the air. The FMC and OSHA guidelines for measurable quantities at the time were 10 ppm. The two readings were 1.0 ppm and 0.8 ppm with a limit of detection at the time of monitoring of 0.5 ppm.

1.3.3. PRESENCE IN

DISTRIBUTED PRODUCT: No DVEster Step I is present in the DVEster Finished Goods products.

1.3.4. TRANSPORT DATA: Step I DVEster is not transported on the site or off site.

Previously, Step I DVEster was packaged and transported to Syngenta (formerly ICI and Zeneca) in England for use in TFPAcid manufacture. This practice was ceased in 2002.

1.3.5 PRESENCE IN END USE PRODUCTS:

Confidential Statements of Formula - DVEster Step I is not included on any Confidential Statement of Formula for the technical materials produced in Baltimore using DVEster Step III Finished Goods as a raw material.

Literature Search - Results from a Chemical Abstracts On-line Database literature search indicate that DVEster Step I is not present in other end-products.

2. PHYSICAL AND CHEMICAL DATA

2.1. MELTING POINT No data available.

2.2. BOILING POINT

2.2.1 **SOURCE #1**

Test Substance: Methyl 3,3-dimethyl-4-pentenoate

Method: Unknown

GLP: No

Year: 1978

73 $^{\circ}$ C @ 6.7 Kpa (50 mm Hg) Data Quality: 4e References: "Permethrin Compendium", M. Fishman, November 17, 1980 2.2.2. SOURCE #2 Test Substance: Methyl 3,3-dimethyl-4-pentenoate Method: Vacuum distillation GLP: No Year: 1983 95-99 $^{\circ}$ C @ 140 mm Hg and 70 $^{\circ}$ C @ 60 mm Hg Results: Data Quality: 4e United States Patent 4,374,264 References: 2.3. VAPOR PRESSURE Methyl 3,3-dimethyl-4-pentenoate Test Substance: Method: Unknown No GLP: Year: Unknown 50 mm Hg@ 73°C Results: Data Quality: 4e FMC MSDS References: 2.4. PARTITION COEFFICIENT No data available. 2.5. WATER SOLUBILITY No data available.

Results:

3. ENVIRONMENTAL FATE AND PATHWAY

3.1. PHOTODEGRADATION

Test Substance: Methyl 3,3-dimethyl-4, pentenoate

Method: Estimated by the AOP program (v. 1.90) which estimates rate constants and half-lives of atmospheric

reactions of organic compounds with hydroxyl radicals and ozone in the atmosphere.

GLP: No

Year: 2000

Results: For reaction with hydroxyl radicals, the predicted half-life is 4.7 hours with a rate constant of 2.72×10^{-13}

cm³/molecule-sec.

Remarks: The photodegradation calculation by an acceptable method is assigned a reliability code of 2f.

References: AOPWIN version 1.90, Syracuse Research Corporation, Syracuse, NY

3.2. STABILITY IN WATER (HYDROLYSIS)

Test Substance: Methyl 3,3-dimethyl-4, pentenoate

Method: Estimated by HYDROWIN program (v. 1.67)

GLP: No

Year: 2000

Results: The estimated half-life for this substance is 5.4 years at pH 8 and 54 years at pH 7.

Remarks: The hydrolysis calculation by an acceptable method is assigned a reliability code of 2f.

References: HYDROWIN version 1.67, Syracuse Research Corporation, Syracuse, NY

3.3. TRANSPORT/DISTRIBUTION (FUGACITY MODEL)

Test Substance: Methyl 3,3-dimethyl-4, pentenoate

Method: Estimated by EPI Suite program (v. 3.05)

GLP: No

Year: 2002

Results: Distribution using Level III Fugacity model

	Concentration	Half-Life	Emissions
	(percent)	(hr)	(kg/hr)
Air	2.86	8.9	1000
Water	34.9	360	1000
Soil	62.1	360	1000
Sediment	0.206	1.44e + 003	0

Remarks: The fugacity calculation by an acceptable method is assigned a reliability code of 2f.

References: EPI Suite version 3.05, Syracuse Research Corporation, Syracuse NY

3.4. BIODEGRADATION No data available.

4. ECOTOXICOLOGY

4.1. ACUTE TOXICITY TO FISH

Test Substance: Methyl 3,3-dimethyl-4-pentenoate

Method: EPA, 1975, Methods for Acute Toxicity Tests with Fish, Macroinvertebrates, and Amphibians. Ecological

Research Series EPA-660/3-75-009. 61 p.

Test was conducted under static condition in 19 L uncovered jars which contained 15 L of natural, filtered (5 micrometers) sea water. Salinity was 29 parts per thousand. Temperature was maintained at 20°C +/- 1. Initial pH was 8 +/- 0.5 for all test concentrations and controls. The sheepshead minnows measured 7- 12 mm standard length. Mortality was < 3% during a 7-day acclimation period. The fish appeared to be in excellent condition at initiation of the test. Each test jar contained 10 fish. There was no aeration.

Sheepshead minnows were exposed to concentrations up to 100 ppm. Test material was dissolved in reagent grade acetone and pipetted into sea water in the appropriate test containers to obtain the desired concentrations. A vehicle control was run with a volume of acetone equal to that added to the highest test concentration.

Species: Sheepshead minnow (Cyprinodon variegates)

Test Concentration (nominal): Less than or equal to 100 ppm

Exposure Period: 96 hours Analytical Monitoring: No GLP: No 1976 Year: Sheepshead minnows were not apparently affected after 96 hours of exposure to methyl 3,3-dimethyl-4-Results: pentenoate at concentrations less than or equal to 100 ppm. Dissolved oxygen remained >65% of saturation in all test concentrations and controls for the duration of the test. The final pH was 8 + -0.5 for all test concentrations and controls. Conclusion: The 96-hr LC_{50} was > 100 ppm. Data Quality: 2d Acute Toxicity of four compounds to Sheepshead Minnows (Cyprinodon variegates), EG&G, Bionomics, References: Study Number ACT 015.11-01, April 1976. 4.2. ACUTE TOXICITY TO **AQUATIC INVERTEBRATES** No data available. 4.3. TOXICITY TO **AQUATIC PLANTS** No data available. 5. TOXICITY 5.1. ACUTE TOXICITY 5.1.1. ORAL Test Substance: Methyl 3,3-dimethyl-4-pentenoate, >98% purity Method: US EPA Pesticide Assessment Guidelines; Subdivision F, Hazard Evaluation: Human and Domestic Animals, November, 1982; 81-1 Acute Oral Toxicity Study

Sprague-Dawley

Male and Female

Species/strain:

Sex:

No. Animals/Group: 5/sex/group 6000, 5000, 4000 mg/kg Dose: Post-dosing observation period: 14 days GLP: Yes Year: 1984 Results: Predominant clinical signs included decreased locomotion, recumbency, abdominogenital staining, ataxia and lacrimation. All signs subsided by day six of the study. All surviving animals gained weight by day 14 of the study. Survivors appeared normal at gross necropsy; findings among decedents included hemorrhagic lungs and intestines and blood in the intestines. Conclusion: The test material is classified as practically non-toxic with a LD50 for males of greater than 5000 mg/kg and the LD50 for females of 5498 mg/kg. Data Quality: 1 References: Acute Oral Toxicity of FMC 30098 Technical in Rats, FMC Study Number A1984-1541, October 15, 1985. **5.1.2. DERMAL** Test Substance: Methyl 3,3-dimethyl-4-pentenoate, >98% purity Method: The test substance was applied topically to the backs of 10 rabbits, 5 rabbits per dosage, under occluded conditions for 24 hours. Observations for toxicity were conducted daily, irritation was evaluated after 1, 2, 3, 4, 7 and 14 days. Species/strain: New Zealand White Rabbits No. Animals: 5 animals/group Dose: 300 mg/kg and 20.0 mg/kg Vehicle: None Exposure Period: 24 hours

Observations for toxicity: daily

Observations for irritation: 1, 2, 3, 4 and 7 days

Post-exposure observations:

GLP: Yes 1985 Year: Results: All of the animals survived the 14-day observation period. No signs of intoxication were observed. Slight erythema was observed in both groups during the first 48 hours. Within 72 hours, all irritation had resolved. However, four days after dosing, redness reappeared on four animals in the 300 mg/kg group and persisted to day 7. Additionally, one animal exhibited desquamation on day 7. At termination, day 14, slight redness persisted on two animals. No unusual findings were observed at gross necropsy. Conclusion: The test substance was practically non-toxic and minimally irritating. Data Quality: 2c References: Preliminary Dermal Toxicity/Irritation of FMC 30098 Technical in Rabbits, FMC Toxicology Laboratory, FMC Study A84-1485, October 128, 1985. 5.1.3. INHALATION Test Substance: Methyl 3,3-dimethyl-4-pentenoate, >98% purity Method: A group of five male and five female Sprague-Dawley rats was exposed to the vapor of the test substance for six hours at an analytically determined concentration of 2000 ppm. Observations for toxicity and mortality were performed frequently during the exposure, on removal of the rats from the chamber, at one hour post-exposure, twice daily for 13 days and once on day 14. Individual body weights were recorded immediately prior to exposure (day 0) and on days 7 and 14. On day 14 all animals were sacrificed and gross necropsy examinations were performed. A similar group of control rat, sham-exposed to room air only, was also included in the study. Species/strain: Sprague-Dawley No. Animals: 5/sex/group Dose: 2000 ppm Vehicle: undiluted Exposure Period: 6 hours Post-exposure

observation period:

14 days

GLP: Yes

Year: 1987

Results: There were no deaths during the study. Clinical signs noted among test rats during and shortly after

exposure included squinting eyes, labored breathing patterns, decreased motor activity, decreased responsiveness and uncoordinated movements. On removal from the chamber and one-hour post dose, all of the exposed animals exhibited uncoordinated gait. One female exhibited red material around the right eye upon removal from the chamber and one male exhibited chromodacryorrhea on Day 1. All of the exposed rats appeared otherwise normal from Days 1 to 14. The only abnormal signs noted in control rats during the study were sporadic incidents of lacrimation and red material around the eye noted during and soon after exposure. All signs subsided by study Day 2. Body weight gains were similar between control and test animals. Renal pelvis dilation of the kidneys was found in one male in the control group and one male from the test material exposed group. These findings are considered to be developmental variations commonly found in this strain of rat and are not considered to be related to treatment. No gross lesions

were observed in any of the remaining animals.

A six-hour exposure of rats to an analytically determined concentration of 200 ppm produced no mortality, body weight changes or gross necropsy findings. The clinical signs observed are suggestive of both slight inhibition and depression of the central nervous system as a possible toxic response to the vapors.

Recovery was rapid and no lasting effects were observed.

Conclusion: The inhalation LC_{50} of the test substance was greater than 2000 ppm.

Data Quality: 2c

References: Acute Inhalation Toxicity Screen of FMC 39008 in Rats, FMC Toxicology Laboratory, FMC Study A85-

1652, May 13, 1987.

5.2. REPEATED DOSE TOXICITY No data available.

5.3. GENETIC TOXICITY IN VITRO AND IN VIVO

5.3.1. GENE MUTATION

Test Substance: Methyl 3,3-dimethyl-4-pentenoate, >98% purity

Method: Salmonella typhimurium/Mammalian Microsome Plate Incorporation Mutagenicity Assay (Ames Test).

The test was conducted using *Salmonella typhimurium* tester strains TA1535, TA1537, TA1538, TA98, TA100 with and without metabolic activation by rat liver microsomes, S9, using the standard protocol.

Appropriate positive and negative controls were included in the assay.

The test article was solubilized in DMSO and serially diluted immediately before its use in the mutagenicity assay. Five doses of the test material were plated with all five tester strains with and without metabolic activation. All solvent controls and test article doses were plated in triplicate.

Type: In vitro mutagenicity in bacteria

System of Testing: Salmonella typhimurium TA1535, TA1537, TA1538, TA98, TA100 with and without metabolic activation

by Aroclor induced rat liver microsomes, S9.

Concentration: 100 to 10,000 ug/plate

Metabolic Activation: S9

GLP: Yes

Year: 1986

Results: The test material did not cause a positive response in any of the five tester strains with or without metabolic

activation.

Conclusion: The test substance was not mutagenic with or without metabolic activation.

Data Quality: 2d

References: Salmonella/Mammalian-Mic rosome Plate Incoproration Mutagenicity Assy (Ames Test), FMC Genetic

Toxicology Laboratory, FMC Study Number A84-1450.

5.3.2. CHROMOSOMAL ABERRATION

No data available.

5.4. REPRODUCTIVE TOXICITY No data available.

5.5. DEVELOPMENTAL TOXICITY/ TERATOGENICITY

No data available.

CRITERIA FOR RELIABILITY CODES (Adapted from Klimisch et al 1997)

Code of Reliability	Category or reliability
1	Reliable without restriction
1a	GLP guideline study (OECD, EC, EPA, FDA, etc.)
1b	Comparable to guideline study
1c	Test procedure in accordance with generally accepted scientific standards and described in sufficient detail
2	Reliable with restrictions
2a	Guideline study without detailed documentation
2b	Guideline study with acceptable restrictions
2c	Comparable to guideline study with acceptable restrictions
2d	Test procedure in accordance with national standard methods with acceptable restrictions
2e	Study well documented, meets generally accepted scientific principles, acceptable for assessment
2f	Accepted calculation method
2g	Data from handbook or collection of data
3	Not reliable
3a	Documentation insufficient for assessment
3b	Significant methodological deficiencies
3c	Unsuitable test system
4	Not assignable
4a	Abstract
4b	Secondary literature
4c	Original reference not yet available
4d	Original reference not yet translated
4e	Documentation insufficient for assessment